

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

23-MC- 9 JLS

\$418,446.48 UNITED STATES CURRENCY
SEIZED FROM CITIZENS BANK ACCOUNT #1341

\$168,072.91 UNITED STATES CURRENCY
SEIZED FROM CITIZENS BANK ACCOUNT #4176,

\$64,253 UNITED STATES CURRENCY,

ONE 2020 GMC SIERRA
VIN: 3GTU9DEL4LG344660,

ONE 2020 FORD F-150
VIN: 1FTEW1E51LFB87846,

ONE 2020 CAN-AM SPYDER
VIN: 2BXRDE20LV000448, and

ONE 2020 TOMBERLIN E-MERGE
GOLF CART VIN: 5FCDD13D7N2003327,

Defendants.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon between the parties, the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, and, Rodney O. Personius, Esq., attorney for claimants Robert Heidenreich and Nicole Plachta, that the government's time to file its Verified Complaint for Forfeiture be extended from April


4, 2023 to July 11, 2023, pursuant to Title 18, United States Code, Section 983(a)(3)(A).

The parties to this Stipulation further agree that Robert Heidenreich and/or Nicole Plachta may revoke their consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then have twenty (20) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

TRINI E. ROSS
United States Attorney
Western District of New York


Dated: 3/21/2023

BY:



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Dated: 3/17/2023



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